UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

PROFESSOR MASAHIRO IIDA, Plaintiff, vs. INTEL CORPORATION, Defendant.	Case No. 6:22-cv-00662-ADA

**DECLARATION OF BIYUN ZHOU REGARDING INTEL CORPORATION'S
MOTION FOR INTRA-DISTRICT TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Biyun Zhou, declare as follows:

1.   I am currently employed by Intel Corporation ("Intel") as an FPGA Development
Tools Engineer. I work at Intel's campus in Austin, Texas. I submit this declaration in support of
Intel's motion for intra-district transfer in the above-captioned litigation. I am over 18 years of
age. This declaration is based on my personal knowledge, and if called as a witness to testify in
this matter, I could and would testify to the facts as set forth herein.

2.   I joined Intel in 2013 as a software engineer. When I started at Intel, I was
responsible for firmware development for mobile baseband chipsets. In 2016, I began working in
Intel's Programmable Solutions Group ("PSG"), where I had responsibility for developing
firmware for Intel's field programmable gate array ("FPGA") devices, which is a role I still
maintain.

3.   I understand that Plaintiff Masahiro Iida has sued Intel for allegedly infringing
U.S. Patent No. 6,812,737 (the "asserted patent"). I understand that the asserted patent relates to
the configuration of look-up tables ("LUTs") in programmable logic devices and that the
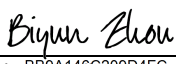
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products accused of infringement include FPGA devices that employ adaptive logic modules ("ALM").

4.   My work as an FPGA Development Tools Engineer focuses on developing firmware for the secure device manager ("SDM"), which is a module on the FPGA devices that controls the security features and configuration of the FPGA devices. The SDM controls the configuration of the FPGA devices by distributing configuration data (often referred to as a "bitstream") to individual sectors of the FPGA. These sectors contain the FPGA's logic elements, or ALMs, and an FPGA device contains multiple, even hundreds, of sectors. Each sector is controlled by a local sector manager ("LSM"). The LSM receives the configuration bitstream from the SDM, parses it, and then uses the data to configure the ALMs for the particular sector.

5.   Archana Sampath is another employee of Intel. She works as an Embedded Software Engineer at Intel's campus in Austin, Texas. Ms. Sampath is knowledgeable regarding the functionality of the LSM firmware, including the functionality of the LSM firmware related to the configuration of the ALMs and LUTs in Intel's FPGA devices.

6.   I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 20, 2022 in Austin, Texas.

DocuSigned by:

Biyun Zhou

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Biyun Zhou